

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

DANIEL GORDON, *et al.*,  
Plaintiffs,

v.

AMADEUS IT GROUP, S.A., *et al.*,  
Defendants.

Civil Action No. 1:15-cv-05457(KPF)

**MOTION FOR CERTIFICATION OF A SETTLEMENT CLASS AND PRELIMINARY  
APPROVAL OF CLASS ACTION SETTLEMENT WITH DEFENDANTS  
TRAVELPORT WORLDWIDE LIMITED AND TRAVELPORT LP**

TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Plaintiffs hereby move this Court for an the entry of an order certifying a settlement class, granting preliminary approval of a settlement with Defendants Travelport Worldwide Limited and Travelport LP, appointing settlement class counsel, approving the proposed notice plan, and setting a hearing for final approval of the settlement. The specific grounds for this motion are set forth more fully in the memorandum filed by Plaintiffs contemporaneously herewith.

Dated: November 22, 2017

/s/ Robert G. Eisler

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*Plaintiffs' Interim Co-Lead Counsel*

**CERTIFICATE OF SERVICE**

I, Robert G. Eisler, hereby certify that on November 22, 2017, I caused the foregoing Plaintiffs' Motion for Certification of a Settlement Class and Preliminary Approval of Class Action Settlement with Defendants Travelport Worldwide Limited and Travelport LP to be filed and served electronically upon all counsel of record via this Court's CM/ECF system.

Dated: November 22, 2017

/s/ Robert G. Eisler  
Robert G. Eisler (Bar #RE1398)